Innovative Systems CVAA Compliance Statement

History

The Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA) was signed into law on October 8, 2010 by President Obama. The CVAA updates federal communications law to increase the access of persons with disabilities to modern communications. It follows a string of laws, passed in the 1980s and 1990s that were designed to ensure that telephone and television services would be accessible to all Americans with disabilities. These laws were not able to keep up with the fast paced technological changes over the past decade. The CVAA contains protections to enable people with disabilities to access broadband, digital and mobile innovations.

Title I requires advanced communication services (ACS) and products to be accessible by people with disabilities. These services are defined as (1) interconnected voice over Internet protocol (VoIP) service; (2) non-interconnected VoIP service; (3) electronic messaging service; and (4) interoperable video conferencing service. Title I of the CVAA creates industry recordkeeping obligations.

Section 255 requires manufacturers and service providers to ensure that their equipment and services are accessible to individuals with disabilities, if such compatibility is readily achievable. These rules were further extended to interconnected voice over Internet protocol (VoIP) service providers and equipment manufacturers.

Section 716 requires providers of ACS and manufactures of equipment used for those services to be accessible to and usable by individuals with disabilities, unless doing so is not achievable.

Section 718 requires manufactures of telephones used with public mobile services and providers of mobile service to ensure that the functions of the Internet browser they include or arrange to be included in such telephones are accessible to and usable by individuals who are blind or have a visual impairment, unless doing so is not achievable.

The “readily achievable” standard requires companies to incorporate features that are easily accomplishable without much difficulty or expense. Companies must balance the costs and nature of the access required with their available resources when determining what is readily achievable.

The following statement details the compliance of the Innovative Systems products subject to the CVAA

CVAA Compliance Statement

APmax Voicemail Service

This section describes the compliance of the APmax Voicemail Service to The Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA).

Input, Controls, and Mechanical Functions

Operable without Vision

Compliance: Yes – The APmax voicemail service provides a Telephony User Interface suitable for users with low or no vision. Access may be assisted by the use of nominally priced telephone devices designed specifically for visually impaired users[1].

Operable with low vision and limited or no hearing

Compliance: Yes – The APmax Web Portal provides a visual interface for users with no hearing and may be enhanced with commonly employed visual accessibility settings for users with low vision. Further the voice transcription feature provides a means to transcribe the voicemail messages into text.

Operable with little or no color perception

Compliance: Yes – The APmax Voicemail Telephony User Interface provides a means for visually impaired users to operate the service using their telephone.

Operable without hearing

Compliance: Yes – The APmax Web Portal Interface provides a visual interface to the APmax voicemail service. Further the voice transcription feature provides a means to transcribe the voicemail messages into text.

Operable with limited manual dexterity

Compliance: Yes – The APmax voicemail Telephony User Interface provides a means for users to operate the service using nominally priced telephone devices suitable for users with limited manual dexterity[2].

---

[1] Future Call FC-4357

[2] AblePhone AP-6000 Voice Activate Inline Telephone Dialer

Operable with limited reach and strength

Compliance: Yes – The APmax voicemail Telephony User Interface provides a means for users to operate the service using nominally priced telephone devices suitable for users with limited reach and strength.

Operable with a Prosthetic Device

Compliance: Yes – The APmax voicemail Telephony User Interface provides a means for users to operate the service using nominally priced telephone devices suitable for users with a prosthetic device.

Operable without time-dependent controls

Compliance: Partial – While the APmax voicemail Telephony User Interface does employ some time-dependent settings for digit timeouts and recording lengths and while there are some service provider options to adjust these settings users with significant impairments where time-dependency is an issue may use the APmax Web Portal interface instead. The APmax Web portal provides a means to interact with the service and listen to voice messages with no time-dependent interface constraints.

Operable without speech

Compliance: Yes – The APmax Telephony User Interface is operable by users without speech. Further, the APmax Web Portal Interface provides a visual interface to the APmax voicemail service.

Operable with limited cognitive skills

Compliance: No – The APmax voicemail service does not provide a means to operate by users with limited cognitive skills.

Output, Displays, and Control Functions

Availability of Visual Information

Compliance: Yes – The APmax Telephony User Interface provides audible instructions for users with visual impairments.

Availability of visual information for low vision users

Compliance: Yes – The APmax Web Portal may be used to operate the voicemail service with PC accessibility settings or third party programs suitable for users with low vision impairments.

Access to Moving Text

Compliance: Not Applicable – The APmax Web Portal does not employ moving text in the visual interface.

Availability of Auditory Information

Compliance: Yes – The APmax Voicemail user's guide provides instructions for operating the voicemail service in a written format. This guide may be provided by the service provider.

Availability of Auditory Information for People Who Are Hard of Hearing

Compliance: Yes – The APmax telephony user interface may be used by people who are hard of hearing when a suitable end user telephone that supports audio amplification or hearing aid coupling is employed[3].

Prevention of Visually-Induced Seizures

Compliance: Yes – The APmax Telephony User Interface is a non-visual interface suitable for users with susceptibility to visually-induced seizures.

Availability of Audio Cutoff

Compliance: Yes - The APmax Telephony User Interface may be used with a telephone that provides an external speaker with an audio cutoff or integrated volume control. The APmax Web Portal audio may be controlled may the volume control settings of the PC in addition to external volume controls on externally attached speakers.

Non-Interference with Hearing Technologies

Compliance: Not Applicable – The APmax voicemail service does not provide any end user equipment that would be subject to this requirement.

Hearing Aid Coupling

Compliance: Not Applicable – The APmax voicemail service does not provide any end user equipment that would be subject to this requirement.

Usability

Full Function

Compliance: Partial – As stated above there are some accessibility restrictions.

Documentation

Compliance: Not Applicable – The APmax User's Guide and other material are provided to the service provider. The service provider may modify this material as needed and provide it or additional documentation to the end user.

[3] Clarity XL45 Telephone for the hearing impaired

Documentation – Product Information

Compliance: Not Applicable – The APmax User's Guide and other material are provided to the service provider. The service provider may modify this material as needed and provide it or additional documentation to the end user.

Documentation Support

Compliance: Not Applicable – Documentation support is provided to the service provider. End user documentation support provided by the service provider.

Technical Support

Compliance: Not Applicable – Technical support is provided to the service provider. End user technical support is provided by the service provider.

Requirements for Compatibility With Peripheral Devices and Specialized Customer Premises Equipment

External Electronic Access to All Information and Control Mechanisms

Compliance: Yes – While the APmax Voicemail Service provides no direct end user interface it is compatible with end user devices that enable manipulation-free connections. These may include infrared mouse pointers and keyboards for use with the PC.

Connection Point for External Audio Processing Devices

Compliance: Yes – While the APmax Voicemail Service provides no direct end user interface devices the APmax Voicemail Service is compatible with end user telephone devices specially designed for needs of visually and hearing impaired users.

TTY Connectability

Compliance: Partial – While the APmax Voicemail Service provides no direct TTY interface a TTY user may access the service via the Teletype Relay Service.

TTY Signal Compatibility

Compliance: Partial – While the APmax Voicemail Service provides no direct TTY interface a TTY user may access the service via the Teletype Relay Service.